

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 1:22-cv-24066-KMM

GRACE, INC., et al.,
Plaintiffs,
vs.
CITY OF MIAMI,
Defendant.

_____ /

333 SE 2nd Avenue
Suite 3200
Miami, Florida
Thursday, October 5, 2023
1:08 p.m. - 3:12 p.m.

DEPOSITION OF ALEXANDRA CONTRERAS

Taken before IVETTE OVIEDO, RPR and Notary
Public For the State of Florida at Large, pursuant to
Defendant's Notice of Taking Rule 30(b)(6) Deposition
filed in the above cause.

1 APPEARANCES:

2 AMERICAN CIVIL LIBERTIES UNION FOUNDATION

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On behalf of the Plaintiffs.

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6 GRAY ROBINSON, P.A.

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On behalf of the Defendant.

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1 Thereupon:

2 ALEXANDRA CONTRERAS

3 was called as a witness and, having been first duly
4 sworn, was examined and testified on her oath as follows:

5 DIRECT EXAMINATION

6 BY MR. JOHNSON:

7 Q Good afternoon, Ms. Contreras. Would you
8 please state your full name for the record?

9 A Alexandra Contreras.

10 Q And what's your date of birth?

11 A [REDACTED].

12 Q And what is your current residential
13 address?

14 A Current residential address is 9725
15 Southwest 110th Street.

16 Q And do you know which district that is in,
17 City of Miami?

18 A That is not in City of Miami.

19 Q Is that Unincorporated Dade?

20 A Yes.

21 Q And how long have you been there?

22 A I have been there for two months.

23 Q Have you ever been deposed before?

24 A No.

25 Q So I'm going to go over a couple of rules

1 just so you know how it kind of goes.

2 If you have any questions, go ahead and ask.
3 So everything is being taken down by the stenographer, so
4 every answer has to be verbal. She can't take down a
5 head nod or a head shake or an affirmative or negative
6 noise, like an uh-huh or an uh-uh. And she also can only
7 take down one of us at a time. So it's important you let
8 me finish the question before you do the answer because
9 in a conversation we tend to talk over each other. That
10 makes her job very difficult. If your counsel objects,
11 let him object. That way we can have a clear record?

12 If you need a break, that's fine. Just let
13 me know. I only ask that there not be a question
14 pending. We will wrap up the question, then we will take
15 the break. If you have any questions about my question,
16 if you don't understand it, just ask me to clarify. And
17 if you answer it, I'll assume that you understood it.
18 Okay?

19 A Okay.

20 Q Are you currently taking any medication that
21 may affect your ability to testify?

22 A No.

23 Q Do you have any medical condition that may
24 affect your ability to testify?

25 A No.

1 Q Did you prepare for this deposition today?

2 A Yes.

3 Q How did you prepare for the deposition?

4 A I read over our initial Complaint. I read
5 over the plaintiff's letter and I reviewed social media
6 posts.

7 Q Did you talk to anyone to prepare?

8 A Just my lawyer.

9 Q I'm not going to ask you about conversations
10 you had with the lawyer. By your lawyer you mean the
11 lawyer for this case, Mr. Warren?

12 A Yes.

13 Q Okay. Just very briefly what's your
14 educational background?

15 A I have a Bachelors degree.

16 Q Bachelor of Arts?

17 A Yes.

18 Q From where?

19 A George Washington University.

20 Q What year?

21 A 2019.

22 Q Not that long ago?

23 A I know. It was hard to think of the
24 number.

25 Q Do you have any certifications?

1 A I have a certification in HTML CSS in
2 coding.

3 Q Are you currently employed?

4 A Yes.

5 Q And where at?

6 A Engage Miami.

7 Q And what's your title?

8 A Senior Communications Manager.

9 Q And how long have you been in that
10 position?

11 A Two years.

12 Q You are not here as the corporate
13 representative of Engage Miami, are you?

14 A No.

15 Q So you are being deposed in your personal
16 capacity?

17 A As an individual plaintiff.

18 Q As an individual plaintiff, but you NO
19 longer live within the City of Miami?

20 A No.

21 Q Have you ever been convicted of a crime?

22 A No.

23 Q Charged?

24 A No.

25 Q Have you ever been involved in a lawsuit?

1 A No.

2 Q Where were you born?

3 A Miami, Florida.

4 Q And you filed a declaration in this case
5 that you're Hispanic and Cuban, correct?

6 A Yes.

7 Q Are your parents from Cuba or Miami?

8 A My parents are from Miami.

9 Q Do you speak any language other than
10 English?

11 A I speak Spanish.

12 Q Fluent?

13 A I would say not a hundred percent.

14 Q Apart from Hispanic and Cuban, do you
15 identify as any other race or ethnicity?

16 A White.

17 Q How long are you planning to be at your
18 current address?

19 A Maybe a year.

20 Q So you are not currently looking to move?

21 A No.

22 Q Are you registered to vote?

23 A Yes.

24 Q And where are you registered to vote at?

25 A Right now I am registered to vote at 3237

1 Southwest 4th Street.

2 Q And that's in the City of Miami?

3 A Yes.

4 Q Have you even changed your voter's
5 registration?

6 A I have not.

7 Q Are you vote planning to vote in the next
8 election in Miami?

9 A No.

10 Q Have you changed your driver's license
11 yet?

12 A No.

13 Q So what address would your voter's
14 registration and driver's license show for you?

15 A Those would both show right now 3237
16 Southwest 4th Street.

17 Q What district would that have been?

18 A District four.

19 Q And how long did you reside there?

20 A A year.

21 Q So you would have moved in there sometime in
22 2022?

23 A Yes.

24 Q About what month?

25 A August.

1 Q Until two months ago?

2 A I moved out August 1st.

3 Q Okay. Where did you live prior to that?

4 A I lived with my mom.

5 Q Is that in Miami?

6 A Yes.

7 Q City of?

8 A Coral Gables.

9 Q Have you ever voted in the City of Miami
10 election?

11 A No.

12 Q Have you voted before?

13 A Yes.

14 Q Which election?

15 A I voted -- I'm trying to think. It's 2023?
16 I voted in 2022 and I voted in 2021, 2020.

17 Q The presidential election?

18 A Yes. I voted before that too, but....

19 (Exhibit Number 23 was marked for
20 identification.)

21 Q I'm showing you the document that we have
22 marked as Defendant's Exhibit 23. It's a document from
23 this case with that same docket entry number and it's
24 titled First Amended Complaint. Do you recognize this
25 document?

1

2 A Loosely, but yes.

3 Q Is it the First Amended Complaint filed by
4 plaintiffs in this action?

5 A Yes.

6 Q Did you review it before it was filed?

7 A Yes.

8 Q Did you approve of it before it was filed?

9 A Yes.

10 Q Paragraph 28 on page 6. It says you are a
11 resident of Little Havana in District 4, correct?

12 A Yes.

13 Q And that's no longer accurate, right?

14 A No.

15 Q In paragraph 31, it alleges that you were in
16 a district in which you were the predominant racial
17 group, correct?

18 A Yes.

19 Q And what is that predominant racial group?

20 A That would be Latin.

21 Q Was that the predominant racial group before
22 you moved into the district?

23 A Yes.

24 Q Did you move into the district as it was
25 already configured, as Latin as the predominant racial

1 group?

2 A Yes.

3 Q Is it okay if I use -- the Complaint uses
4 Hispanic primarily, so I may use Hispanic or Latin or
5 Latino or Latina interchangeably; is that okay?

6 A Yeah.

7 Q Did you object to moving into an area where
8 Hispanics were the predominant racial group?

9 A When you say "object" --

10 Q Well, you are complaining in this paragraph
11 31 about being in a district where you are in the
12 predominant racial group, correct?

13 A Yes.

14 Q Then why did you move into it?

15 A So I moved into it because it was the
16 cheapest place I could find.

17 Q But you didn't object to moving into it
18 because Hispanics were the predominant racial group
19 there, right?

20 A No.

21 Q Did you expect that it would change and they
22 would no longer be the predominant racial group?

23 A No.

24 (Exhibit Number 109 was marked for
25 identification.)

1 BY MR. JOHNSON:

2 Q All right. So I'm showing you what's been
3 marked as Defendant's Exhibit 109. It's a document from
4 this case with that same docket entry number and it's
5 titled Supplemental Complaint. Do you recognize this
6 document?

7 A Yes.

8 Q And have you seen this document before?

9 A Yes.

10 Q Did you review this document before it was
11 filed?

12 A Yes.

13 Q So if you look at Paragraph 14, it states
14 that you are a resident of District 4, correct?

15 MR. WARREN: Object to form.

16 THE WITNESS: Yes.

17 BY MR. JOHNSON:

18 Q It states that you are a resident of
19 District 4 under '22 plan and of District 4 under the
20 2023 plan, correct?

21 MR. WARREN: Object to form.

22 MR. JOHNSON: What's the objection.

23 MR. WARREN: It's sounds like you are saying
24 is a resident and it reads was a resident.

25 MR. JOHNSON: Okay. Thank you. You are

1 correct.

2 BY MR. JOHNSON:

3 Q So this is accurate that you were a resident
4 of those districts, but are no longer?

5 A Yes.

6 Q Why are you still a plaintiff?

7 A In this case?

8 Q Yes.

9 A Well, I'm still a plaintiff because I still
10 want to be a plaintiff. I want to be involved in this
11 case. Yeah.

12 Q But in terms of voting, you won't be
13 affected by the outcome of this case, will you?

14 A As of right now, no, because I'm in
15 Unincorporated Miami-Dade. However, I love Miami. I'm
16 from here. I was born and raised and I do, I think, plan
17 on living in the City of Miami in the future and,
18 therefore, I do have a vested interest.

19 Q When say you "plan on moving to the City of
20 Miami," you have no specific plan or specific date,
21 correct?

22 A No.

23 Q Did you have any input in the drafting of
24 these pleadings?

25 A No.

1 (Exhibit Number D-24-83 was marked for
2 identification.)

3 BY MR. JOHNSON:

4 Q I'm showing you what's been marked as
5 Defendant's Exhibit 24-83, a document from this case with
6 that same docket entry number titled 2022 Enacted Plan.
7 Have you seen this map before?

8 A Yes.

9 Q And what is this?

10 A This is a map that the City of Miami put
11 forth.

12 Q And when did they put forth?

13 A 2022.

14 Q Do you understand that this is the map that
15 you challenged in the Amended Complaint?

16 A Yes.

17 Q What specifically do you disagree with about
18 this map?

19 A I disagree with the shape of the districts.
20 I think they are atypical. I also disagree with the
21 basis for these districts. It was based on race.

22 Q All right. So let's start with the shape.
23 Which particular shapes do you have an objection to?

24 A So District 2. District 5. I think
25 District 4 as well, and District 3.

1 Q All right. What specifically about District
2 2 do you object to about the shape of it?

3 A I wish it could run along US-1 rather than
4 cut into or include -- no, actually cut out that part of
5 District 3.

6 Q Okay. Are you talking about the little
7 purple square around Natoma Manors?

8 A Yes.

9 Q So why do you think it should run along US-1
10 and not include that?

11 A So Coconut Grove, the neighborhood is all
12 south of US-1 and, therefore, I think it should remain
13 intact within District 2.

14 Q Do all neighbors have to remain intact?

15 A Not all.

16 Q I mean, you've seen plaintiff's plans that
17 don't keep all the neighborhoods intact, right?

18 A Yes.

19 Q So you understand sometimes neighbors don't
20 stay intact?

21 A Right.

22 Q So what neighborhoods do you think should
23 stay intact?

24 A Coconut Grove.

25 Q Why Coconut Grove?

1 A So I think Coconut Grove should stay intact
2 because it's a community that has been intact for a long
3 time. I think neighbors there know each other. They are
4 used to voting in certain places. And I also think they
5 have a long history of advocacy that I think could be in
6 jeopardy with this map.

7 Q Do you think that including that square
8 Natoma Manors in District 3 was based on race?

9 A Truthfully I don't know what it was based
10 on.

11 Q Well, you brought this case, right? So what
12 are you alleging it was based on? Are you alleging it's
13 based on race?

14 A I'm alleging that this map in general was
15 drawn based on race. This specific area, Natoma Manors,
16 I truly can't even begin to guess why the City of Miami
17 would put that in District 3 with Little Havana.

18 Q You don't have any guesses?

19 A Not a single one.

20 Q Do you read social media, newspaper articles
21 about this case?

22 A Yes.

23 Q You never heard any mention about why that
24 part of Coconut Grove may have been included in District
25 3?

1 A I've heard theories.

2 Q And what's that theory?

3 A I've heard that it's too include Carollo's
4 house in District 3.

5 Q That he has a house in that area, correct?

6 A Correct.

7 Q Do you think that could have been the reason
8 it was included?

9 A I don't know.

10 Q You talked about the atypical shape in
11 District 2. Was that the only issue you had with
12 District 2 in terms of the shape?

13 A Well, it also puts district -- there's a
14 piece of District 4 that was formerly District 2, and I
15 would also point that out.

16 Q You are talking about the little orange
17 triangle that's south of US-1 just above Coconut Grove on
18 the map?

19 A Yes.

20 Q And where do you think -- you think that
21 should be in District 2?

22 A Correct.

23 Q Why?

24 A Same reasoning as before. I think Coconut
25 Grove, the neighborhood is South of US-1 and, therefore,

1 it should remain intact.

2 Q Do you know what the predominant racial
3 demographic of Coconut Grove is?

4 A I could guess.

5 Q What do you think it is?

6 A I think it might be White.

7 Q So we'll circle back, circle back to the
8 second reason, race, in a minute. Let's go back to
9 irregular shapes. Any other irregular shapes you have an
10 issue with in District 2?

11 A No.

12 Q You don't have any issue that it runs
13 north-south along the coast?

14 A Not right now.

15 Q And the plaintiffs, in fact, have maps where
16 they have a District 2 where it runs north-south along
17 the coast, don't they?

18 A Correct.

19 Q Okay. How about District 5? What's your
20 issue with the atypical shape of District 5?

21 A So District 5 goes very far south into
22 downtown up against the Miami River. That's the issue I
23 have.

24 Q Do you think downtown should not be in
25 District 5?

1 A Yes.

2 Q Why?

3 A I think it has more in common with parts of
4 District 2 demographically and by maybe the issues they
5 face.

6 Q And what's your understanding as to why that
7 area was included in District 5?

8 A Truthfully, I don't have a lot of
9 understanding as to why.

10 Q You think that was a racial move?

11 A I do think the City of Miami is trying to
12 pack Black voters into District 5.

13 Q Do you know what the percentage of Black
14 voters in District 5 is?

15 A No.

16 Q Do you have an opinion on what that
17 percentage should be?

18 A No.

19 Q Do you think District 5 should be a district
20 where -- designed to ensure that the Black residents have
21 the ability to elect the candidate of their choice?

22 A Yes.

23 Q Do you think it's acceptable to consider
24 race when drawing District 5 in order to ensure that the
25 Black residents have the ability to elect a candidate of

1 their choice?

2 A Consider, yes.

3 Q But you have no opinion on what that
4 percentage should be?

5 A No.

6 Q But you agree it should be high enough that
7 it's gives them the ability to elect that candidate,
8 correct?

9 A Yes.

10 Q With regard to -- oh, do you have any other
11 issue about the shape of District 5?

12 A No.

13 Q With regard to District 3, what was your
14 issue with regard to the shape of District 3, other than
15 the Natoma Manors thing, which we just discussed?

16 A Uh-huh. I have a quick question.

17 Q Sure.

18 A Can I compare this map to the previous City
19 of Miami map?

20 Q Yeah. I will bring that out in a minute.
21 I'm just asking, looking at it now if you have any issue
22 with the shape of District 3 other than the Natoma Manors
23 we already talked about?

24 A As of right now, no.

25 Q So let's go to District 4 then. Now, this

1 was the district that you lived in at the time of filing
2 of the suit, correct?

3 A Yes.

4 Q And that was the shape of the district when
5 you moved into it, wasn't it?

6 A They enacted this --

7 Q If they enacted this in early 2022?

8 A Right. Early 2022.

9 Q And the lawsuit was filed in December.

10 A Right. And I moved in in August. Yes.

11 Q So what is your issue with the atypicality
12 of the shape of District 4, other than the triangle, you
13 know, south of US-1 into the Grove?

14 A Right. The triangle is south. The
15 Shenandoah area, the way -- the way District 4 cuts south
16 and then east among, I think that's Calle Ocho, and then
17 south again, basically the west of District 4 is shaped
18 strangely to me.

19 Q What district do you think Shenandoah should
20 be in?

21 A I think that's up to legal experts of
22 redistricting.

23 Q But you are the plaintiff, so I'm asking you
24 a question. And you were a resident of District 4 at the
25 time the suit was filed?

1 A Right. I was not in Shenandoah.

2 Q So you don't have an opinion on Shenandoah,
3 correct?

4 A Correct.

5 Q Any other issue with the shape of District
6 4?

7 A No.

8 Q All right. Let's talk about, you also --
9 you talked about atypicality of shape and you also
10 disagreed with the map because you said you believe it
11 was based on race?

12 A Yes.

13 Q Why do you believe it was based on race?

14 A So I believe that the City of Miami
15 commissioners attempted to draw a map to maintain a
16 Hispanic majority in the Commission and to also pack
17 Black voters in District 5. Keep Districts 1, 3 and 4
18 majority Hispanic. And then keep District 2 as a, I
19 guess, open seat.

20 Q Was it meant to be the anglo access seat?
21 You have to answer verbally.

22 A Oh. Yes.

23 Q If you take that triangle that was in
24 District 4 out of District 4, put it back in 2, and you
25 take that Natoma Manors part out of District 3 and put it

1 back in 2, do you think that makes District 2 more or
2 less anglo?

3 A I don't know.

4 Q But you thought that the predominant race or
5 majority race in District 2 was White, right?

6 A Yes.

7 Q You would agree that if District 2, all of
8 Coconut Grove stays in District 2, it's going to tend
9 this to make that district whiter, won't it?

10 MR. WARREN: Object to form.

11 THE WITNESS: If all of Coconut Grove is in
12 District 2?

13 BY MR. JOHNSON:

14 Q As opposed to putting some of it in other
15 districts?

16 A It would make District 2 Whiter.

17 Q Wouldn't it?

18 MR. WARREN: Object to form.

19 THE WITNESS: I mean, I'm kind of like I
20 don't know.

21 BY MR. JOHNSON:

22 Q I don't know is a fine answer. I'm going to
23 ask you a lot of questions because you are a Plaintiff
24 and there are allegations in the lawsuit, but, you know,
25 I'm trying to get to the depth of your understanding

1 because you are the one bringing the allegations?

2 A Right.

3 Q So with regard to packing of District 5,
4 what is your definition of packing, as you understand
5 it?

6 A As I understand it, packing is when you draw
7 district boundaries to keep certain voters in certain
8 districts.

9 Q Okay. You talked earlier about it being
10 okay to draw District 5 in order to have a sufficient
11 number of Black voters for them to elect a candidate of
12 their choice, right?

13 A Yes.

14 Q Do you consider that to be packing?

15 A Can you repeat the question?

16 Q Yes. If you were to draw District 5 in
17 order to put in a sufficient number of Black voters so
18 that they would be able to elect a candidate of their
19 choice, would you consider that to be packing?

20 A No.

21 Q So then what would be packing?

22 A I think packing goes beyond allowing a
23 certain, I guess, group to have their preferred choice of
24 candidate. I think packing is, like, more when maybe you
25 don't want certain voters in other districts, so you put

1 them in.

2 Q Do you believe that this took Black voters
3 out of the other districts and put them in 5?

4 A I would think so.

5 Q Now, you have to do a certain percentage of
6 that to get to the number of voters you need for them to
7 elect the candidate of their choice, right?

8 A Right.

9 Q So is there a number beyond which it's
10 packing?

11 A I would imagine there is a number based off
12 of population, racial demographics.

13 Q Do you have an understanding of what that
14 number is?

15 A No.

16 Q You said that they created three Hispanic
17 districts?

18 MR. WARREN: Object to form.

19 BY MR. JOHNSON:

20 Q Is that accurate? I don't want to misstate
21 your testimony.

22 A I wouldn't say create.

23 Q Why would you not say create?

24 A The Commission being a Hispanic majority is
25 not new.

1 Q Do you have any idea whether or not the City
2 of Miami itself is a Hispanic majority city?

3 A I would say yes.

4 Q Do you know if it's possible to create a
5 City Commission where three of the districts won't be
6 majority Hispanic?

7 A I'm sure it is possible.

8 Q Why are you sure that's possible?

9 A I mean, you can draw a map however you need
10 to. I feel like we are getting into the realm of, what
11 is it called, hypotheticals.

12 Q And I may ask you hypotheticals.

13 A Okay. Is this one of them?

14 Q Well, that is. You said you thought it was
15 possible that you can draw a map. All right.

16 Do you think it's possible to draw that map
17 and have a relative equality of population. I mean,
18 obviously, if you were to make one district extremely
19 small, you can probably do it, but if you're going to
20 have five districts of relative equal population, say
21 within ten percent of each other, do you think it's
22 possible to draw three districts that wouldn't be
23 majority Hispanic?

24 A I think it's possible.

25 Q Did the plaintiffs do that in any of their

1 maps that you know of?

2 A I don't have the maps in front of me.

3 Q We will get to them. But you know that the
4 plaintiffs suggested four maps, right?

5 A Yes.

6 Q Do you know whether or not all four of those
7 maps have three majority Hispanic districts?

8 A I'm not sure as of right now.

9 Q Okay. We are going to get to the maps. And
10 this is the map as it existed when you moved into the
11 City, correct?

12 A Yes.

13 (Exhibit Number D-82-34 was marked for
14 identification.)

15 BY MR. JOHNSON:

16 Q I'm showing you what's been marked as
17 Defendant's Exhibit 82-34. That's a document from this
18 case with that same docket entry number. It's titled P1
19 Plaintiffs' Map 1. Do you recognize this map?

20 A Yes.

21 Q And what is that?

22 A This is the first map the plaintiff's
23 proposed.

24 Q Okay. Did you draw this map?

25 A No.

1 Q Do you know who drew the map?

2 A I have an idea, yeah.

3 Q Who?

4 A ACLU.

5 Q Did you have any input in any of the lines
6 that were put into this map?

7 A No.

8 Q Did you approve of this map?

9 A Yes.

10 Q Did you discuss this map with anyone other
11 than your attorneys prior to submitting it to the City?

12 A No.

13 Q Would you make any changes to this map?

14 A No.

15 Q Now, District 2 in this map crosses US-1,
16 doesn't it?

17 A Yes.

18 Q So it's okay to draw districts crossing US-1
19 sometimes then, isn't it?

20 A Yes.

21 Q So you don't -- are any neighbors
22 neighborhoods split in this map you're aware of?

23 A No.

24 Q Is Edgewater split in this map?

25 A Truthfully I can't tell if it's the label or

1 the neighborhood.

2 Q That's fair. So labeling can be a little
3 confusing. I did not label the map, obviously, and so to
4 a certain extent what I'm really asking is your
5 understanding of where these neighborhoods are. Okay?

6 So, for example, do you understand whether
7 or not little Havana is completely included in District 3
8 here or if it's split between 3 and 4.

9 A That's a good question.

10 Q Do you know?

11 A I personally would say like the historic
12 neighborhood of Little Havana is intact in this map.

13 Q You consider Little Havana to have defined
14 borders?

15 A No.

16 Q Somewhat nebulous?

17 A Yes.

18 Q Is that pretty much true for all these
19 unincorporated neighborhoods?

20 A Yes.

21 (Exhibit Number D-82-35 was marked for
22 identification.)

23 BY MR. JOHNSON:

24 Q I'm showing you what's been marked as
25 Defendant's 82-35. It's a document from this case with

1 that same docket entry number titled P2, Plaintiffs' Map

2 2. Do you recognize this document?

3 A Yes.

4 Q And what is this?

5 A This is the second map the plaintiffs
6 proposed.

7 Q Okay. Was this proposed at the same time as
8 the first map?

9 A Yes.

10 Q Did you draw this map?

11 A No.

12 Q Do you know who drew the map?

13 A I believe the ACLU did.

14 Q And ACLU is your counsel in this case,
15 correct?

16 A Yes.

17 Q Did you have any input in any of the lines
18 as they are drawn on the map?

19 A No.

20 Q Did you approve the map?

21 A Yes.

22 Q Did you discuss this map with anyone other
23 than your counsel prior to approving it?

24 A No.

25 Q Do you have any issues with this map that

1 you would make changes to?

2 A No.

3 Q Do you believe this map packs races or sorts
4 races in the three Hispanic districts and Anglo access
5 district and the Black district?

6 A It's hard for me to say without the district
7 demographics.

8 Q Okay. Have you seen the district
9 demographics?

10 A I've seen them, I think, for the 2022 City
11 of Miami plan.

12 Q Are you aware that plaintiffs have filed an
13 expert report in this case from Dr. Caroline Abbott?

14 A No.

15 Q Have you seen that expert report?

16 A (Witness nods).

17 Q Have you seen the demographics with it?

18 A I don't think so.

19 Q Have you seen any of the demographic
20 breakdowns of the Plaintiffs' maps?

21 A I believe I have, but I can't remember
22 specifics of any.

23 Q I'm showing you what's been marked as
24 Defendant's Exhibit 82-12, a document from this case with
25 that same docket entry number. It's titled Appendices,

1 Appendix 1, Plan District Demographics. Have you ever
2 seen this before?

3 (Exhibit D-82-12 was marked for
4 identification.)

5 A I don't think so.

6 Q So this is an Appendix that plaintiffs'
7 filed in this case to an expert report showing the White
8 Voting Age Population, Hispanic Voting Age Population,
9 Black Voting Age Population, White Citizen Voting Age
10 Population, Hispanic Citizen Voting Age Population, and
11 Black Citizen Voting Age Population for different plans
12 broken down by district. Do you see that?

13 A Yes.

14 Q And you understand WVAT for example is White
15 Voting Age Population; HVAT is Hispanic Voting Age
16 Population; BVAP is Black Voting Age Population?

17 A Yes.

18 Q And the WCHC and BC versions are the same,
19 but broken down by citizen?

20 A Yes.

21 Q I'm going to turn you now to page 16.

22 There's a table for P1, P2, P3 and P4. You
23 understand these are the Plaintiffs' four different
24 maps?

25 A Yes.

1 Q If you look at P1, for example, the Hispanic
2 Voting Age Population for district one is 70 percent,
3 correct? 70.1.

4 A Yes.

5 Q And for District 3 it's 90.8 percent,
6 correct?

7 A Yes.

8 Q And for District 4 it's 95 percent,
9 correct?

10 A Yes.

11 Q And in P2, District 1 is 86.6 percent,
12 Hispanic Voting Age Population?

13 A Yes.

14 Q And District 3 is 84.8 percent Hispanic
15 Voting Age Population?

16 A Yes.

17 Q And District 4 is 95.6 percent Hispanic
18 Voting Age Population?

19 A Yes.

20 Q So that sorts those three districts into
21 three majority Hispanic districts, doesn't it?

22 A Yes.

23 Q In fact, some of them are extremely
24 Hispanic, above 90 percent, correct?

25 A Yes.

1 Q Okay. And in each of these there is a
2 District 5 that has a higher Black voting age population
3 than any of the other districts, correct?

4 A Yes.

5 Q And in each of them, District 2 has a higher
6 White Voting Age Population than any of the other
7 districts, correct?

8 A Yes.

9 Q In fact, in P2, it's 36.9 percent,
10 correct?

11 A Yes.

12 Q Okay. So these two maps also sort the City
13 into three Hispanic districts, an Anglo assess direct and
14 a Black district, don't they?

15 A Correct.

16 Q And you are still okay with them?

17 A Yes.

18 Q So is it acceptable to have three Hispanic
19 districts, an Anglo access district and a Black district
20 when drawing a map of the City of Miami?

21 A Yes.

22 Q So why was it improper when the City did
23 it?

24 MR. WARREN: Object to form.

25 MR. JOHNSON: You can answer.

1 THE WITNESS: I can answer. It was improper
2 when the City did it because -- or I guess I
3 should say my issue with the City of Miami map
4 that they proposed is, again, that they split
5 neighborhoods, Coconut Grove.

6 BY MR. JOHNSON:

7 Q Let's go to Plaintiffs' Map 2. Do you
8 understand whether or not this map splits Overtown?

9 A Truthfully, no. I don't understand.

10 Q I mean, it does have Overtown, the words
11 split evenly between District 1 and District 5, doesn't
12 it?

13 A Yes.

14 Q And Downtown appears to be split between
15 District 1 and District 2, doesn't it?

16 A Yes.

17 Q Edgewater appears to be split between
18 District 5 and District 2, doesn't it?

19 A Yes.

20 Q Brickell appears to be split between
21 District 3 and District 2, doesn't it?

22 A Yes.

23 Q But you are okay with the splitting of those
24 neighborhoods, right?

25 A Well, to me, again, it's like the splitting

1 of the label.

2 Q Assuming that it does, in fact, split those
3 neighborhoods, would you be okay with it?

4 A I recognize that neighborhoods need to be
5 split sometimes.

6 Q But just not Coconut Grove, right?

7 A Just not these specific -- I don't want to
8 say just not Coconut Grove because there are other
9 neighborhoods that I'm sure shouldn't be split either.

10 Q Which ones?

11 A I mean, The Roads.

12 Q Besides The Grove?

13 A The Roads. Flagami has no reason to be
14 split.

15 Q Why not Flagami?

16 A Just because it's so west.

17 Q I mean, is there anything unique to Flagami
18 that it should not be split between two districts?

19 A I mean, if you split it, it would just be a
20 very strange district shape.

21 Q Other than the shape, is there any other
22 reason that it shouldn't be split between two
23 districts?

24 A Not that I can think of right now.

25 Q Do you know if it was ever in one

1 district?

2 A I don't.

3 Q Do you think it's more important to keep
4 Flagami in one district than Overtown?

5 A Can you repeat the question?

6 Q Do you think it's more important to keep
7 Flagami all in one district than it is to keep Overtown
8 all in one district?

9 A No. I don't think one is more important
10 than the other.

11 Q But at least with regard to Plaintiffs' Map
12 2, it appears that it keeps Flagami in one district, but
13 not Overtown, correct?

14 A The label is split.

15 Q So if it doesn't keep Overtown in one
16 district, you are still okay with that though, right?

17 A Yes.

18 Q But not with Flagami being in two
19 districts?

20 A Yes.

21 Q Why is Flagami different than Overtown?

22 A It's not that it's different, and I think we
23 are hyper fixating on Flagami where as I was just
24 throwing out a random example.

25 Q I'm just trying to figure out how important

1 it is to you to keep Flagami in one district and why?

2 A Again, I threw through it out as a random
3 example.

4 Q That was the district you lived in though
5 when the lawsuit was filed though, right?

6 A District 4. I was not in Flagami though.

7 Q If parts of Flagami were put in a different
8 district, would that be important to you?

9 A As long as it maintained the Voting Rights
10 Act.

11 Q As long as it didn't violate the Voting
12 Rights Act?

13 A Right.

14 (Exhibit Number D-82-36 was marked for
15 identification.)

16 BY MR. JOHNSON:

17 Q I'm showing you what's been marked as
18 Defendant's 82-36. Exhibit 82-36. It's a document from
19 this case with the same docket entry number. It's titled
20 P3 - Plaintiffs' Map 3. Have you seen this document
21 before?

22 A Yes.

23 Q And what is this?

24 A This is the third map that the Plaintiffs'
25 proposed.

1 Q And did you draw this map?

2 A No.

3 Q Do you know who drew the map?

4 A I believe so, yes.

5 Q And who was that?

6 A ACLU.

7 Q Did you have any -- did you make any changes
8 to this map on any of the lines?

9 A No.

10 Q Did you approve the map?

11 A Yes.

12 Q And that was after it was already drawn,
13 right?

14 A Yes.

15 Q Did you discuss the map with anyone besides
16 your counsel before approving it?

17 A No.

18 Q Do you have any issue with this map; any
19 changes you would make?

20 A Not right now.

21 Q Okay. If I could bring you back to
22 Defendant's 82-12, the appendices, the tables?

23 A Uh-huh.

24 Q And if we can go ahead on page 16 and look
25 at P3, that's Plaintiffs' Map 3, correct?

1 A Yes.

2 Q So in Plaintiffs' Map 3, the District 1 has
3 an 85.4 percent HVAP.

4 MR. WARREN: Object to form.

5 BY MR. JOHNSON:

6 Q Does District 1 have an 85.4 percent
7 Hispanic Voting Age Population?

8 A Yes.

9 Q And does District 3 have an 84.9 percent
10 Hispanic Voting Age Population?

11 A Yes.

12 Q And does District 4 have a 95.6 percent
13 Hispanic Voting Age Population?

14 A Yes.

15 Q And is the White Voting Age Population of
16 District 2 37.9 percent?

17 A Yes.

18 Q And is the Black Voting Age Population of
19 District 5 48.8 percent?

20 A Yes.

21 Q Do you have any issue with that demographic
22 breakdown?

23 A Not right now.

24 Q Do you feel that it sorts the City into
25 three Hispanic districts, a Black district and an Anglo

1 access district?

2 A Yes.

3 Q Does it?

4 A Yes.

5 Q Okay. Is that wrong?

6 A What do you mean?

7 Q Is it improper for that map to sort the City
8 into those five districts with those demographics?

9 A No.

10 Q Why?

11 A Because this map respects neighborhoods and
12 maintains normal shapes of districts and geographic
13 boundaries.

14 Q So is your only issues with the shape and
15 the geographic boundaries and not with the racial
16 breakdown?

17 MR. WARREN: Object to form.

18 THE WITNESS: I wouldn't say it's my only
19 issue.

20 BY MR. JOHNSON:

21 Q Do you think -- going back to the 2022
22 Enacted Plan, Defendant's 24-83, do you think that that
23 map was designed to maximize the racial concentration in
24 each of the districts?

25 A When you say "maximize" --

1 Q Yes. Do you think that Defendant's 24-83,
2 the 2022 Enacted Plan, was meant to make the racial
3 concentrations in the Hispanic districts as high as
4 possible for Hispanics and the Black district as high as
5 possible for Blacks and the Anglo district as high as
6 possible for Whites?

7 Go ahead and take a look at D-23.

8 MR. WARREN: Is the question withdrawn?

9 MR. JOHNSON: First Amended Complaint.

10 Yeah, withdraw the question.

11 BY MR. JOHNSON:

12 Q And if you could turn to page -- I'm going
13 to go to paragraph 271, that's going to be on page 39.
14 Do you see where it's alleged to "The Commission's goal
15 was to make the Hispanic population of District 1, 3 and
16 4 as high as possible, thereby stripping Hispanic
17 residents from Districts 2 and 5 and diminishing their
18 influence in those two districts?"

19 A I'm sorry, where are you?

20 Q Paragraph 271 on page 39.

21 A Okay. Yes.

22 Q You believe that's accurate?

23 A Yes.

24 Q So let's go back and look at Defendant's
25 82-12, the Appendices. All right. So if you look at the

1 first page, you see the Enjoined Plan?

2 A Yes.

3 Q So the Hispanic -- is the Hispanic Voting
4 Age Populations in District 1, 3 and 5, 89.5, 88.3 and
5 89.5, respectively?

6 A Yes.

7 Q And if you go ahead and turn to the last
8 page, the Plaintiff's three plans that we just looked at
9 and Plan 1, the Hispanic Voting Age Population in those
10 three districts is 70.1, 90.8 and 95 percent,
11 respectively, isn't it?

12 A Yes.

13 Q And in Plan 2, it's 86.6, 84.8 and 95.6,
14 respectively, isn't it?

15 A Yes.

16 Q And in Plan 3, it's 85.4, 84.9 and 95.6
17 percent, respectively?

18 A Yes.

19 Q In all three of those plans, District 4 is
20 95 percent or above Hispanic, correct?

21 A Yes.

22 Q The City's plan didn't do that, did it?

23 A No.

24 Q So you still agree that City's plan packed
25 Hispanics as high as possible?

1 MR. WARREN: Object to form.

2 THE WITNESS: I agree right now.

3 BY MR. JOHNSON:

4 Q You agree what?

5 A With what you just said.

6 Q The City's plan was to pack it as high as
7 possible or no?

8 A Well, the high as possible I don't think
9 they were trying to pack it as high as possible.

10 Q In fact, all the plans have three
11 majority -- super majority Hispanic districts, don't
12 they?

13 A Yes.

14 Q Do you know if it's possible to draw the
15 City of Miami without super majority Hispanic
16 districts?

17 A I think it's possible.

18 Q Then why didn't the plaintiffs do it?

19 A Well, I think we are limited by the amount
20 of districts and this is me. You know, I'm not a
21 redistricting expert.

22 Q Sure. But you are the Plaintiff or one of
23 Plaintiffs. That's why I'm asking you in terms of the
24 allegations you are bringing?

25 A Right.

1 Q And you understand that within this
2 Complaint are your allegations?

3 A Yes.

4 Q So if it's possible to draw the City so as
5 not to have majority Hispanic districts, why was that not
6 done by the plaintiffs?

7 A I'm sure the redistricting experts have an
8 explanation for that. I don't.

9 Q But you don't know whether it's possible or
10 not, do you?

11 A I think anything is possible.

12 Q Numbers are numbers, aren't they?

13 A Yes.

14 MR. WARREN: Object to form.

15 BY MR. JOHNSON:

16 Q You know, if I have a City that's, say, 70
17 percent Hispanic, there's going to be a majority of
18 Hispanics somewhere, right?

19 A Maybe.

20 Q Maybe? Okay. All right. We will leave off
21 the math for now. Let's go to -- we didn't mark Map 4
22 yet, right?

23 A No. Would now be a good time for a break?

24 Q Yeah. Absolutely.

25 (Recess taken.)

1 BY MR. JOHNSON:

2 Q I'm going to show you what we have already
3 marked as Defendant's 82-37, which is a document from
4 this case with that same docket entry number and it's
5 titled P4, Plaintiffs' Map 4. Do you recognize that
6 document?

7 (Exhibit Number D-82-37 was marked for
8 identification.)

9 A Yes.

10 MR. WARREN: If you are looking for a copy
11 for me, I have one on my screen.

12 BY MR. JOHNSON:

13 Q All right. Have you seen this document
14 before?

15 A Yes.

16 Q And what is this?

17 A This is the fourth map that the plaintiffs
18 proposed.

19 Q And did you draw this map?

20 A No.

21 Q Do you know who drew the map?

22 A Yes.

23 Q And who is that?

24 A ACLU of Florida.

25 Q And did you make any changes to any of the

1 lines of this map?

2 A No.

3 Q Did you approve this map before it was sent
4 to the Court?

5 A Yes.

6 Q Was it already drawn when you approved it?

7 A It was like in draft.

8 Q Did you have any input on what the drawing
9 of that draft would be?

10 A I was invited for input, but I did not put
11 any.

12 Q And did anyone tells have input in the
13 drawing of this map?

14 A Not that I know of.

15 Q Did you discuss this map with anyone prior
16 to submitting it to the Court other than your counsel?

17 A Wait. Sorry. Can you repeat the question?

18 Q Sure. Prior to this map was submitted, did
19 you discuss this map with anyone other than your counsel.
20 Let me clarify. If it was a meeting with other
21 Plaintiffs that your counsel was also present, other than
22 that?

23 A I believe this is the map that we -- well,
24 you're actually asking me if we had input before
25 submitting it?

1 Q Correct.

2 A And we submitted it July 6?

3 Q Yes.

4 A I can't remember or not. Basically we had
5 community forums with these maps.

6 Q And those were open to the public?

7 A Yes.

8 Q What was discussed at the community forum?

9 A For this map, I'm pretty sure, if I remember
10 correctly, the discussion was around Overtown and what
11 the geographical boundaries of that neighborhood were.

12 Q And was there debate over what those
13 boundaries were?

14 A Yes.

15 Q Did everybody agree?

16 A No.

17 Q How many community forums were there?

18 A There were two in total.

19 Q And when was the first one?

20 A I don't remember exactly when. It was this
21 summer.

22 Q And when was the second one?

23 A The second one was also the summer.

24 Q How far apart were they?

25 A I'm not sure. Maybe like a month.

1 Q Did you attend the Miami City Commission
2 meeting that occurred in June of this year?

3 A Yes.

4 Q Was one of them before that meeting?

5 A Yes.

6 Q And was one after that meeting?

7 A Yes.

8 Q And how were these community forums
9 advertised to your knowledge?

10 A They were promoted on Engage Miami's social
11 media in our e-mails and I believe other plaintiffs also
12 promoted the community forums.

13 Q Did anyone take notes at the meeting?

14 A Not that I know of.

15 Q Do you know if the meetings were recorded?

16 A I don't think either of them were.

17 Q So in terms of the discussion of Overtown,
18 what were people debating about the borders of
19 Overtown?

20 A Truthfully, I don't know Overtown very well,
21 so I don't even remember what boundaries specifically
22 they were discussing.

23 Q But everyone had an opinion, right?

24 A Well, like the residents of Overtown did,
25 you know.

1 Q Did they all agree with each other as to
2 what the boundaries were?

3 A I can't remember, but I don't think so.

4 Q What else was discussed at the community
5 forum? Let's talk about the first community forum. Did
6 the first community forum discuss Map 3?

7 A I don't remember if it discussed Map 3
8 specifically.

9 Q Was Map 3 already drawn at the time of the
10 first community forum?

11 A I also don't remember that.

12 Q What was discussed at the first community
13 forum?

14 A So the first community forum was in Coconut
15 Grove and mostly what was discussed was agreement of
16 keeping Coconut Grove together.

17 Q And why did they want to keep Coconut Grove
18 together?

19 A Folks said that as residents, as people in
20 the neighborhood, they didn't want to be split apart into
21 different districts and have different commissioners,
22 therefore, have different people representing them. They
23 wanted to maintain basically their status as like one
24 neighborhood.

25 Q Was there any discussion about that

1 neighborhood would be more white?

2 A There was no discussion of that.

3 Q Was there any discussion of racial
4 demographics?

5 A No, not that I remember.

6 Q Do you remember anything else that was
7 discussed at First Community Forum.

8 A No.

9 Q How about the second community forum; what
10 was discussed there?

11 A The second community forum was held in
12 Overtown and the discussion was or, I guess, the goal was
13 to get a better idea of how residents of Overtown defined
14 their neighborhood and what the geographic boundaries of
15 Overtown were.

16 Q Do you remember if there was a definitive
17 source as to what would be those boundaries?

18 A I don't remember.

19 Q Was anything else discussed beside the
20 borders of Overtown?

21 A Not that I remember.

22 Q And that's the main difference between
23 Plaintiffs' Map 3 and Map 4, isn't it?

24 A Yes. Well, there's other differences,
25 but....

1 Q Right. Okay. So Map 4 pushes District 5 a
2 little further west in Overtown, right?

3 A Yes.

4 Q And as a result, that means that -- all
5 right. Well, you'll see that there's a difference
6 between districts 3 and 4, right?

7 A Yes.

8 Q What's the reason for that difference?

9 A I'm not sure.

10 Q So you don't know why that line was
11 changed?

12 A No.

13 Q Are you okay with that shape in District
14 4?

15 A In which Map?

16 Q In Map 4. See where the line between
17 District 3 and 4, how it changed instead of being one
18 line running along that one road and now sort of jogs
19 north and east.

20 A Yes.

21 Q You okay with that shape?

22 A Yes.

23 Q That's not irregular to you?

24 A No.

25 Q Okay. So sometimes it's okay to go off

1 major roads and have shapes that go like stepping stones,
2 right?

3 A I recognize that sometimes redistricting
4 boundaries can be strange because you need to keep the
5 population equal between the districts?

6 Q Did you make any changes to this district,
7 Map 4?

8 A No.

9 Q So Maps 1, 2, 3 and 4 are all different,
10 Plaintiffs' Maps 1, 2, 3, 4?

11 A Yes.

12 Q And you are okay with all these different
13 maps?

14 A Yes.

15 (Exhibit Number D-82-24 was marked for
16 identification.)

17 BY MR. JOHNSON:

18 Q I'm showing you what's been marked as
19 Defendant's 82-24 document from this case with that same
20 docket entry number titled Resolution 23-271? Do you
21 recognize this map?

22 A Yes.

23 Q And what is this map?

24 A This is the map, the City of Miami
25 proposed.

1 Q Were you at the June meeting of the City of
2 Miami?

3 A Yes.

4 Q Were you there when this map was being
5 approved?

6 A I don't believe so because I left early.

7 Q Do you have any issue with this map?

8 A I do.

9 Q And what's the issue?

10 A Coconut Grove is still split.

11 Q And you are talking about the Natoma Manors
12 and Bay Heights area?

13 A Yes.

14 Q Do you consider Natoma Manors and Bay
15 Heights to be part of Coconut Grove?

16 A I would, yes.

17 Q Does Coconut Grove consist of a number of
18 neighborhoods?

19 A Yes.

20 Q Why do each of those neighborhoods all have
21 to be together in the same district?

22 MR. WARREN: Object to form.

23 BY MR. JOHNSON:

24 Q Do each of those neighborhoods have to be
25 together in the same district?

1 MR. WARREN: Object to form.

2 THE WITNESS: I think it would be good if
3 they were.

4

5 BY MR. JOHNSON:

6 Q Is it necessary?

7 A I think it favors the residents when
8 they are all unified.

9 Q Do you think putting Natoma Manors and Bay
10 Heights in District 3 concentrates Hispanics in District
11 3 or do you think it lowers the percentage of Hispanics
12 in District 3?

13 MR. WARREN: Object to form.

14 THE WITNESS: That I don't know.

15 BY MR. JOHNSON:

16 Q Do you have any other issues with this
17 map?

18 A Yes.

19 Q What?

20 A I don't love the way District 5 goes so far
21 South.

22 Q Why is that?

23 A I think the neighborhoods are really just
24 the neighborhood of downtown. I don't know that it
25 belongs in District 5.

1 Q Why not?

2 A I don't imagine that those voters and
3 residents have a lot in common, or I believe they have
4 more in common with residents of, example, District 2,
5 maybe even District 1.

6 Q Do you think that the downtown area is more
7 or less Black than the rest of District 5?

8 A That I don't know.

9 Q Do you think that adding downtown into
10 District 5 concentrates Black residents in District 5.
11 It packs them.

12 MR. WARREN: Object to form.

13 THE WITNESS: I don't really know.

14 BY MR. JOHNSON:

15 Q Do you know why downtown was included in
16 District 5?

17 A No.

18 Q Did you hear Commissioner King talk about
19 the downtown area in District 5?

20 A Yes.

21 Q And what did she say?

22 A She said that she really wanted -- from what
23 I remember the downtown for her district.

24 Q Is that because it's an economic engine?

25 MR. WARREN: Object to form.

1 THE WITNESS: That I believe.

2 BY MR. JOHNSON:

3 Q Do you have any reason to disagree with
4 that?

5 A Disagree with it being a economic engine?

6 Q Yeah.

7 A No.

8 Q Do you think it's improper to include an
9 economic engine area into District 5?

10 MR. WARREN: Object to form.

11 MR. JOHNSON: What's the objection?

12 MR. WARREN: I don't know what an economic
13 engine is.

14 MR. JOHNSON: Well, that was a term she said
15 that she agreed. The fact that you don't
16 understand it, it's okay.

17 BY MR. JOHNSON:

18 Q Do you think it's improper?

19 A Do I think it's improper that District 5
20 wants an economic engine?

21 Q No. Do you think it's improper to include
22 an economic engine area into District 5?

23 A No.

24 Q You just don't like it?

25 A I don't like it.

1 Q Okay. Any other issue with this map?

2 A Not right now.

3 Q Going back to Defendant's 82-12, which is
4 the Appendices with the demographics, if you look at page
5 16, in Plaintiffs' Map 1 you would have been in District
6 4, right?

7 A Well, actually let me look. Yes.

8 Q And that area has a 95 percent Hispanic
9 voting age population, doesn't it?

10 A 95 percent. We are at Plaintiff's 1?

11 Q Yes.

12 A Yes.

13 Q And Plaintiffs' Map 2, would you have been
14 in District 4?

15 A Yes.

16 Q And in Plaintiffs' Map 2, it has a 95.6
17 percent Hispanic voting age population?

18 A Yes.

19 Q And in Plaintiffs' Map 3 would you have been
20 in District 4?

21 A Yes.

22 Q And in Plaintiffs' Map 3, District 4 has a
23 95.6 percent Hispanic voting age population?

24 A Yes.

25 Q And in Map 4, would you have been in

1 District 4?

2 A Yes.

3 Q And in Map 4, again, it has 95.6 percent
4 Hispanic voting age population?

5 A Yes.

6 Q If you could take a look at the First
7 Amended Complaint, which is D-23. And if I can get you
8 to turn to paragraph 31. In paragraph 31 you allege the
9 enacted plan places Plaintiff's Miro and Contreras --
10 that's you, right?

11 A Yes.

12 Q In a district where you're the predominant
13 racial group?

14 A Yes.

15 Q All of Plaintiffs' Maps would have put you
16 in a district where you were in the predominant racial
17 group, isn't that correct?

18 A Yes.

19 Q Do you have an issue with that?

20 A With that specifically? Like with being in
21 my district and being the predominant racial group, no.

22 (Exhibit Number D-24-40 was marked for
23 identification.)

24 BY MR. JOHNSON:

25 Q I'm showing you what's been marked

1 Defendant's Exhibit 24-40, a document from this case with
2 that same docket entry number titled Declaration of
3 Alexandra Contreras. Is that your declaration?

4 A Yes.

5 Q Is that your signature on the second page?

6 A Yes.

7 Q In the Declaration paragraph 6, you say, "As
8 a resident of the newly enacted City Commission District
9 4, I am concerned that Hispanic residents like me have
10 been packed into my district on the basis of their race."

11 A Yes.

12 Q Don't all four of the Plaintiffs' Maps pack
13 you into a highly Hispanic packed District 4?

14 A Yes.

15 Q If you look at the enjoin plan and go back
16 to 82-12, first page, the Hispanic voting age population
17 of District 4 was 89.5 percent, wasn't it?

18 A Yes.

19 Q It was, in fact, less packed, wasn't it?

20 A Yes.

21 Q Then you go to the next page. The
22 Resolution 23-271, the Hispanic voting age population of
23 District 4 is 90 percent. Correct?

24 A Yes.

25 Q That's also less packed, isn't it, than any

1 of the Plaintiffs' plans?

2 A Yes.

3 Q So why are you okay with the Plaintiffs
4 putting you into a more Hispanic packed district?

5 A Truthfully -- well, can you repeat the
6 question? I'm sorry.

7 Q Why aren't you concerned with the
8 Plaintiffs' Maps that would have put you into a more
9 packed Hispanic district?

10 A I like the Plaintiffs' Maps more because I
11 think they respect neighborhoods and boundaries more.

12 Q So it's not to do with the race breakdown,
13 right?

14 A I do think the City of Miami has used race
15 on a basis to draw their maps.

16 Q But don't the Plaintiffs' Maps also break
17 out the racial demographics in precisely the same way?

18 MR. WARREN: Object to form.

19 THE WITNESS: From my understanding, and I'm
20 not a redistricting expert, you kind of have to.

21 BY MR. JOHNSON:

22 Q Because the demographics of the City, is
23 that right?

24 A Or because of the Voting Rights Act.

25 Q Well, the Voting Rights Act, which districts

1 do you understand that applies to, to your
2 understanding?

3 A Well, the Voting Rights Act, from my
4 understanding, applies to like every district in the US
5 everywhere. You understand what I'm saying?

6 Q Well, what's your understanding of how it
7 applies to the City of Miami?

8 A My understanding is that it protects
9 resident's right to choose a candidate of their
10 preference. Right? And then it also doesn't allow us to
11 diminish the voting power of certain communities by just
12 packing them into another district.

13 Q Do you think that either of the City's maps,
14 the 2022 one or the 2023 one, diminish any voting group's
15 voting power by packing them into a certain area?

16 A I do, yes.

17 Q Which group got diminished and where?

18 A So Coconut Grove.

19 Q Okay?

20 A The neighborhood of Coconut Grove and the
21 residents of Coconut Grove are in 2022 split into two
22 districts. In 2023 split into, I guess, just one.

23 Q So your understanding of the Voting Rights
24 Act is that the citizens of Coconut Grove have a right to
25 be in the same district with each other?

1 A Not that they have a right to be in the same
2 district as each other, but that their voting power as a
3 block can be protected under that Act.

4 Q Why?

5 A Because they have similar interests as a
6 neighborhood.

7 Q Okay. So you are suing -- I'm trying to get
8 your understanding of the lawsuit as a plaintiff. So
9 you are telling me you believe that the Voting Right Act
10 protects the citizens of Coconut Grove to all to be
11 together in one district?

12 A Okay. I'm saying the Voting Rights Act, as
13 I understand it --

14 Q Okay. And I understand you are not a
15 lawyer?

16 A Thank you. The Voting Rights Act is being,
17 I guess, not respected in this map because it is
18 splitting this neighborhood. It is packing these voters
19 that were once unified into District 4 and District 3. I
20 don't know if packing is the right term. Right? But
21 they are being split up.

22 Q Okay. They are being split up. Do you
23 think that Coconut Grove is being split up based on their
24 race?

25 A I believe this map is drawn on the basis of

1 race.

2 Q Do you believe Coconut Grove specifically is
3 being split up based on the race of the residents of
4 Coconut Grove?

5 A Honestly, I don't know why Coconut Grove is
6 being split up.

7 Q But you would agree with me that the
8 plaintiffs' plans all concentrate different races in the
9 different districts, right?

10 A Yes.

11 Q And all of the plans, plaintiffs' plans and
12 the City's plans, have a District 5 in roughly the same
13 area, isn't that right?

14 A Yes.

15 Q And they all have a coastal district along
16 the water?

17 A Yes.

18 Q And they all have three heavily Hispanic
19 districts to the west, right?

20 A Yes.

21 Q And the demographic breakdown is roughly the
22 same in all the plans, but the City's and the
23 Plaintiffs', isn't it?

24 A Yes.

25 Q So the City doesn't concentrate people or

1 separate people into races anymore or less than the
2 plaintiffs do, does it?

3 A I think they do more than we do.

4 Q Why? Where?

5 A District 5.

6 Q That's okay. I didn't mean to interrupt
7 you. I apologize.

8 A District 5.

9 Q So let's look at District 5. So if you look
10 at the City's plan, right?

11 MR. WARREN: Which one?

12 BY MR. JOHNSON:

13 Q Well, let's look at the recent one 2023 on
14 page two. So the Black voting age population of District
15 5 is 50.3 percent. So is your opinion that 50.3 percent
16 packs Black voters into District 5?

17 A My understanding of packing isn't
18 necessarily by, like, percentage. As we said earlier,
19 I'm sure there is -- remember when we were talking about
20 math earlier and we were saying how there probably exists
21 somewhere in this world a percentage in which it would be
22 considered packing. I don't necessarily know that this
23 is.

24 Q Packing?

25 A Right.

1 Q Then why did you say you thought that the
2 City did it with regard to District 5?

3 A Because to me the packing is the fact that
4 District 5 comes so far South.

5 Q But if the downtown area had a lesser
6 percentage of Black residents than the other parts of the
7 City, wouldn't that be the opposite of packing by
8 including that area?

9 A I don't know.

10 Q Okay. That's fair. If you look at -- so we
11 talked about the 50.3 percent Black voting age population
12 of the City's plan?

13 A Yes.

14 Q If we look at Plaintiff's Plan 3, the Black
15 voting age population in District 5 is 48.8 percent,
16 isn't it? It's within a percent and a half of each
17 other, aren't they?

18 A Yes.

19 Q And if you look at the Black citizen voting
20 age population for the City's Resolution 23, that's 57.4
21 percent, correct?

22 A Yes.

23 Q And for Plaintiff's Plan 3 it's 56 and a
24 half percent, right?

25 A Yes.

1 Q That's less than a percent apart, isn't
2 it?

3 A Yes.

4 Q So they are very simpler, aren't they?

5 A Yes.

6 Q Now, in paragraph 31 of the Amended
7 Complaint, going back to Document 23. I was asking you
8 about the first sentence. Let's take a look at the
9 second sentence. "The Enacted Plan sends a message that
10 they were placed in their district simply because of
11 their race."

12 Now, when you moved into District 4, it was
13 already a majority Hispanic district, wasn't it?

14 A Yes.

15 Q And after the '22 plan, that's the plan you
16 moved into, right?

17 A Yes.

18 Q And that was a majority Hispanic district?

19 A Yes.

20 Q So how can you say that you believe you were
21 placed there solely based on your race?

22 A Well, I feel like we are using my move a
23 lot.

24 Q Yeah.

25 A I feel like we are talking about my move.

1 Q Yes. You moved into an area, so the
2 allegation says you were placed in that district based on
3 your race.

4 A Right.

5 Q But that's not accurate for you, is it?

6 A Well, was I personally placed there?

7 Q Yes. You.

8 A No.

9 Q Okay. Right. In fact, in all of
10 Plaintiffs' plans, you would continue to be in a District
11 4 that is more than 95 percent -- that is 95 percent or
12 above Hispanic, correct?

13 A Right.

14 Q Okay. If I can bring you back to your
15 Declaration, 24-40, on the second page, paragraph 8. So
16 at this time in February you were still talking about the
17 2022 plan, correct?

18 A Yes.

19 Q And in paragraph 8, you say, "In particular,
20 it concerns me that Little Havana is split into three
21 districts, and that the Commission seems to have done so
22 deliberately to allocate Hispanic residents into three
23 different districts."

24 A Yes.

25 Q Let's take a look 2022. What three

1 districts is Little Havana in?

2 A One, 3 and 4.

3 Q So you're considering Little Havana to go
4 pretty far north, right?

5 A Yes.

6 Q And pretty far south, right?

7 A Yes.

8 Q Or pretty far west?

9 A West. Yes.

10 Q How far west do you consider it to go?

11 A I personally would consider -- I mean, as I
12 said earlier, there's Little Havana, like the historic,
13 you know, where Ball and Chain is.

14 Q As you define Little Havana in paragraph 8
15 of your Declaration.

16 A Okay. I personally would define Little
17 Havana as going beyond -- you see in District 4 that cut
18 out piece that's Little Gables.

19 Q Yeah, but the City of Miami juts into -- you
20 know, or the Gables juts into City of Miami?

21 A I would consider Little Havana honestly
22 going beyond that.

23 Q Okay. And how far north does it go?

24 A I would also consider it going -- I would
25 consider it going like along the Miami River.

1 Q And how far south?

2 A How far south?

3 Q Does it go south of 8th Street at all?

4 A Yes, in parts.

5 Q How far south?

6 A How far south? Not that far south, like a
7 couple of blocks maybe.

8 Q All right. So let's look at Plaintiffs' Map
9 1. Doesn't that also split up Little Havana as you just
10 defined it?

11 A So it would split it into two districts.

12 Q So you don't consider it to go all the way
13 north to the river except in the east?

14 A Right.

15 Q Okay. How about -- And the two districts
16 are District 3 and 4, right?

17 A Yes.

18 Q Plaintiffs' Map 2.

19 A Yes.

20 Q How many districts is it split into there?

21 A Here I would say it's split in two. I would
22 say it's split into three.

23 Q And how about Plaintiffs' Map 3? Same?

24 A Yeah.

25 Q And Plaintiffs' Map 4? Same?

1 A Yeah.

2 Q And those are Districts 1, 3 and 4?

3 A Yes.

4 Q And isn't that the same thing that you were
5 concerned about in paragraph eight of your Declaration?

6 A Yes.

7 Q Why is it okay if the Plaintiffs do it, but
8 not the City?

9 A I'm glad you asked. I think our maps, as I
10 said previously, have more respect for natural boundaries
11 rather than just jagged edges.

12 Q But I'm asking you specifically about
13 paragraph eight where you said your concern is splitting
14 Little Havana into three districts. I mean, you did
15 consider keeping neighbor cohesion important, right?

16 A Yes.

17 Q Specifically you talked about Coconut Grove
18 repeatedly, right?

19 A Yes.

20 Q Why not Little Havana? Why is it more
21 important to keep Coconut Grove together than Little
22 Havana?

23 A I wouldn't say it's more important.

24 Q Then why do the Plaintiffs' Maps all keep
25 Coconut Grove together and not Little Havana?

1 A I don't know.

2 Q Back to your Declaration, 24-40. Prior to
3 signing the Declaration, did you review any documents?
4 Did I ask you that already?

5 A I don't know.

6 Q I don't think so. Did you review any
7 documents prior to signing the Declaration?

8 A What documents specifically, like legal?

9 Q Legal documents or maps or demographics or
10 information of any kind?

11 A I don't remember.

12 Q Okay. Other than your attorney, did you
13 discuss your Declaration prior to signing it?

14 A No.

15 Q Did you draft it?

16 A No.

17 Q On paragraph 5, you say, "I believe the City
18 Commission map should be drawn fairly. I believe that
19 the process of creating the map should have been fairer,
20 including the Hispanic residents of Miami."

21 We already talked -- we took out that map,
22 right, went through it. Is there anything else that you
23 felt was unfair other than what we have already discussed
24 today.

25 A I think what I'm referring to here in the

1 past was the City Commission, I remember, in 2022 had
2 public hearings about redistricting. And in those public
3 hearings there was a lot of public comment saying -- a
4 lot of people spoke out against the proposed map and it
5 was still passed.

6 Q Do you know if there were any changes made
7 to it after people spoke out?

8 A I don't remember.

9 Q Okay. So you don't know if changes were
10 made and what those were?

11 A No.

12 Q And that was before you moved into the City,
13 correct?

14 A That was before, yes.

15 Q So you didn't attend any of those meetings?
16 You would have read the transcripts after, right?

17 A I read the transcripts after.

18 Q Do you know whether there was an issue with
19 regard to the historic Black West Grove? I'm just asking
20 you if you know.

21 A I believe there was an issue.

22 Q All right. Do you have an idea of where the
23 boundaries of the historic Black West Grove would be?

24 A Not really.

25 Q So if you look at the 2022 Enacted Plan,

1 Docket Entry 24-83, we talked about that little triangle
2 of District 4 that is in Coconut Grove. Do you know
3 whether or not that particular triangle is in the
4 historic Black West Grove?

5 A I believe it is.

6 Q Why?

7 A Based off of what I heard in 2022 from
8 public comment?

9 Q You read the transcripts?

10 A So actually I didn't read the transcripts.
11 I watched the video online.

12 Q All right. You do understand that there
13 were multiple iterations of plan that were worked on
14 throughout those hearings in 2022, right?

15 A I don't remember there being multiple plans.

16 Q So you don't know if there were any changes
17 made after there was complaints made at the City
18 Commission about the historic Black West Grove?

19 A I don't know.

20 Q And you personally don't know whether or not
21 that triangle is in the historic Black West Grove?
22 You're just basing that on listening to people's
23 complaints at the hearing, right?

24 A I'm basing it off of what residents of the
25 Grove said.

1 Q But you don't know whether or not those
2 complaints were made before or after changes were made to
3 the map, do you?

4 A They were made during the redistricting
5 process.

6 Q Okay.

7 A I don't know --

8 Q At what point in the map evolution those
9 complaints were made, do you?

10 A I mean, it was before the map was, like,
11 finished.

12 Q All right. So you understand that they were
13 working on the map over a period of time, right?

14 A Yes.

15 Q And there was more than one meeting, wasn't
16 there?

17 A Yes.

18 Q And at different meetings they would propose
19 different shapes of that plan, wouldn't they?

20 A That I don't specifically remember.

21 Q So you don't know whether or not the
22 complaints about the historic Black West Grove were
23 before or after there may have been changes in the plan,
24 do you?

25 A I don't remember.

1 Q Do you have an issue with the ethnic makeup
2 of the City of Miami Commission?

3 A Not really.

4 Q When you were in the City of Miami, there
5 were four Hispanic Commissioners and a Black
6 Commissioner, correct?

7 A Well, yes, because Covo was elected in
8 2022.

9 Q And did you have an issue with having four
10 Hispanic commissioners and a Black commissioner?

11 A No issue.

12 Q You didn't think that was unfair, right?

13 A No.

14 Q You don't believe that Hispanics were
15 excluded from the process, do you?

16 A No.

17 MR. WARREN: Object to form.

18 BY MR. JOHNSON:

19 Q So in paragraph 7 of your declaration,
20 Defendant's Exhibit 24-40, you said your concerned that
21 District 4 is extremely atypical in shape. "I'm worried
22 that my district's shape is largely because the
23 Commission wanted the district to have a racial
24 demographic, and did not draw the map to best serve our
25 neighborhood or to provide representation."

1 What racial demographic are you referring
2 to?

3 A I'm referring to the Commission and I said
4 this earlier, trying to maintain a Hispanic majority.

5 Q And District 4 particularly we are talking
6 about, is that correct?

7 A I'm talking about the Commission as a whole,
8 right.

9 Q Well, right here you are talking about --
10 paragraph 7 you're specifically talking about District 4,
11 correct?

12 A Yes.

13 Q And if you look at the '22 Enacted Plan, put
14 that side by side, what about the shape is atypical that
15 you believe was done to achieve a certain racial
16 demographic?

17 A I think the triangle south of US-1 was put
18 in District 4.

19 Q To make it more or less Hispanic?

20 A To make it less Hispanic and possibly to
21 dilute the voting power of those residents.

22 Q Okay. You believe the racial demographic --
23 you said to make it less Hispanic. So you are saying it
24 was to dilute the voting power of the White residents?

25 A Of those folks in the Grove. Of those folks

1 in that triangle.

2 Q So you believe that triangle was made to
3 make District 4 less Hispanic?

4 A I believe the triangle was made to dilute
5 the voting power of those residents in that triangle.

6 Q And what's the racial demographic of those
7 residents in that triangle?

8 A I don't know.

9 Q So you're saying it was done without regard
10 to their race, just those particular people?

11 A Can you reframe the question?

12 Q Sure. What do you think the Commission had
13 against those particular people in that triangle that
14 they wanted to dilute their voting power?

15 A I don't really know.

16 Q Then why do you believe that?

17 A Well, I think the residents of this triangle
18 South of US-1 don't have a lot in common with the
19 majority of residents in District 4.

20 Q So do you understand why they had to
21 redistrict in 2022?

22 A I would guess because of the Census.

23 Q So the Census happened, right? And you
24 understand that District 2 had grown larger than the
25 other districts?

1 A Yes.

2 Q And, therefore, some people from District 2
3 had to be reassigned other districts in order to level
4 the population out, right?

5 A Yes.

6 Q So somewhere you're going to take people
7 from District 2 and put them in a different district,
8 right?

9 A Correct.

10 Q But you are saying just not from Coconut
11 Grove?

12 A It's not how I would do it.

13 Q Okay. But it would have to come from
14 somewhere?

15 A It would have to come from somewhere.

16 Q Where should it have come from?

17 A So in our Plaintiff maps, it usually came
18 from the north and of District 2.

19 Q So you think that the people in the north of
20 District 2 should be put in District 5, but the people
21 south of District 2 should not be put in District 3 or
22 4?

23 A I think the residents of District 2 in that
24 north end have more in common with residents of District
25 5 than this triangle of people in The Grove.

1 Q Why?

2 A Of District 4.

3 Q Why do you think that?

4 A Why do I think that?

5 Q Yeah?

6 A I mean, I think US-1 is a big boundary for a
7 lot of neighborhoods.

8 Q Okay. But you agree it's okay to cross
9 US-1. The plaintiffs did it Map 1, didn't they?

10 A Yes.

11 Q So why do you think that people in the north
12 side of District 2 have more in common with District 5
13 than the people and in the south part of District 2 have
14 in common with Districts 3 or 4?

15 A I just think the neighborhood are more
16 similar. I think Morningside is more similar to Little
17 River, Little Haiti than The Grove is to --

18 Q How is it more similar? More similar in
19 what way?

20 A More similar in, I guess, the set up of the
21 neighborhood.

22 Q What do you mean by that?

23 A Northeast Miami to me is more of a like a
24 big city. Coconut Grove, West Coconut Grove I don't
25 think has a lot in common, again, with District 4, the

1 makeup of it.

2 Q So you've kind of given me, I don't think
3 they're in common, but I'm trying to figure out what
4 commonalities or lack of commonalities, specifically your
5 meaning or if it's just your general impression? If it's
6 based on any specific fact or issue, I'm trying to
7 determine what that is.

8 A When I talk about neighborhoods, it's
9 general impression.

10 Q Okay. So you couldn't tell me exactly what
11 that little triangle has or doesn't have in common with
12 the rest of Coconut Grove versus Golden Pines? I mean,
13 see the Golden Pines area?

14 A Uh-huh.

15 Q Okay. Let's look at Plaintiff's 1. That
16 Golden Pines area is included in the same area as that
17 triangle, isn't it?

18 A Yes.

19 Q Is that wrong?

20 A I don't think it's wrong.

21 Q I mean, you just said they don't have
22 anything in common, it goes across US-1.

23 MR. WARREN: Object to form.

24 BY MR. JOHNSON:

25 Q Why is it okay to do it there, but not in

1 the City's map?

2 A Can you repeat the question?

3 Q Yeah. You just talked about how that little
4 triangle shouldn't be included with the neighborhoods in
5 the other side of US-1 because US-1 is a natural boundary
6 and those neighborhoods don't have things in common with
7 one another, and yet why is it okay to do it in
8 Plaintiffs' Map 1?

9 A I mean, in Plaintiffs' Map 1, I would say at
10 the least, the neighborhood of Silver Bluff is kept in
11 its entirety. The neighborhood of Golden Pines is kept
12 in its entirety. The neighborhood of Coconut Grove is
13 kept in its entirety. Whereas, in the City of Miami,
14 2022 Enacted Plan, Coconut Grove is not kept in its
15 entirety.

16 Q Okay. We talked about Coconut Grove not
17 being kept in its entirety. I'm talking back to you
18 saying this little triangle doesn't have anything in
19 common with Golden Pines and, therefore, should not be in
20 the same district as Golden Pines, but it's okay if
21 they're in the same district in Plaintiffs' Map 1, right?

22 A Yes.

23 Q So are they similar or dissimilar.

24 A I guess it's -- and I feel like I'm going
25 back on what I said. It's not that they are dissimilar.

1 It's that the neighborhoods are intact.

2 Q Okay. And keeping neighborhoods intact we
3 talked about earlier?

4 A Yes.

5 Q And, in fact, the plaintiffs do split some
6 neighborhoods, don't they?

7 A Yes.

8 Q And you agreed with me that some
9 neighborhoods are going to have to be split to
10 redistrict, right?

11 A Yes.

12 Q And then we went back and we were talking
13 about specifically where in District 2 they should shed
14 population because they have to shed population, right?

15 A Yes.

16 Q And you said you thought they had -- that
17 the south, that triangle didn't have things in common
18 with Golden Pines, therefore, it shouldn't be shed in the
19 south, but, in fact, it has enough in common with Golden
20 Pines that they can be united in Plaintiffs' Map 1,
21 right?

22 A Well, this triangle has enough in common
23 with the rest of The Grove that it can stay in the same
24 district as the rest of The Grove.

25 Q But also be included with the Golden Pines

1 area?

2 A Sure.

3 Q So you say Silver Bluff has more in common
4 with Coconut Grove than it does with Shenandoah?

5 A I wouldn't say that.

6 MR. JOHNSON: No further questions.

7 CROSS-EXAMINATION

8 BY MR. WARREN:

9 Q Just a few questions.

10 Ms. Contreras. At the time this lawsuit was
11 filed, where were you living?

12 A At the time the lawsuit was filed, I was
13 living at 3237 Southwest 4th Street.

14 Q And that's in City of Miami, District 4?

15 A Yes.

16 Q At the time you signed this declaration,
17 were you living in the same place?

18 A In District 4.

19 Q And at the time the City Commission passed
20 the map in June 2023, were you living in the City of
21 Miami in District 4?

22 A Yes.

23 Q Going back to Mr. Johnson asked you
24 questions about whether you had input in how the lines
25 were drawn in P1, P2, P3 and P4. You remember that?

1 A Yes.

2 Q And you said that you had input before P4
3 was submitted?

4 MR. JOHNSON: Objection. Predicate.

5 THE WITNESS: Yes.

6 BY MR. WARREN:

7 Q Did you have an opportunity to give input
8 before P1 was submitted?

9 A Yes.

10 Q Did you provide input, if you can recall?

11 A I don't recall. I'm pretty sure I agreed
12 with the map and, therefore, like --

13 THE COURT REPORTER: I didn't hear the end.

14 THE WITNESS: Sorry. I was asked for input.
15 I didn't have any is what I would say.

16 BY MR. WARREN:

17 Q And how about for P2?

18 A Same for three P2.

19 Q And how about for P3?

20 A Same for P3.

21 Q Do you remember when P3 was submitted to the
22 City?

23 A I believe it was the summer of, I believe,
24 this year, but I don't remember, no.

25 Q Okay. Paragraph 8 of your Declaration, the

1 second paragraph of that sentence says, "The Commission
2 seems to have done so deliberately to allocate Hispanic
3 residents into different districts." Do you see that?

4 A Yes.

5 Q Do you have the same concern with the
6 Plaintiffs' Maps?

7 A No.

8 MR. WARREN: Okay. No more questions.

9 REDIRECT EXAMINATION

10 BY MR. JOHNSON:

11 Q Just one follow-up. You said that you did
12 have input into Map 4?

13 A Yes.

14 Q What was that input?

15 MR. WARREN: I'm going to instruct the
16 witness not to answer on the grounds to protect
17 attorney-client privilege.

18 BY MR. JOHNSON:

19 Q Did you make any changes to Map 4?

20 MR. WARREN: Object to form.

21 THE WITNESS: Did I personally make changes?

22 MR. JOHNSON: Yes.

23 THE WITNESS: No.

24 MR. JOHNSON: Thank you. Yes, copy.

25 MR. WARREN: We'll read.

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(Whereupon, the deposition was concluded at
3:12 p.m.)

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CERTIFICATE OF OATH

STATE OF FLORIDA :

COUNTY OF MIAMI-DADE :

I, Ivette Oviedo, Shorthand Reporter and Notary Public, State of Florida, certify that, ALEXANDRA CONTRERAS, appeared before me on the 5th day of October, 2023, and was duly sworn.

WITNESS my hand and official seal this 23rd day of October, 2023.



Ivette Oviedo, RPR# 961103

Notary Public, State of Florida at Large:

Commission No.: HH 356470

Expiration date: March 7, 2027

CERTIFICATE

STATE OF FLORIDA :
: SS.
COUNTY OF MIAMI-DADE :

I, IVETTE OVIEDO, RPR certify that I was authorized to and did stenographically report the deposition of ALEXANDRA CONTRERAS in the above-entitled cause; that a review of the transcript was requested; and that the transcript is a true and complete record of my stenographic notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

Dated at Miami-Dade County, Florida, this 23rd day of October, 2023.



Ivette Oviedo, RPR# 961103

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October 23, 2023

ALEXANDRA CONTRERAS

Attn: Nicholas Warren, Esq.

nwarren@aclufl.org

RE: GRACE, INC., et al., v. CITY OF MIAMI,

DEPO OF: ALEXANDRA CONTRERAS

TAKEN: 10-5-2023

JOB #: 6121394

Dear ALEXANDRA CONTRERAS:

The above-referenced transcript is available for review.

You should read the testimony to verify its accuracy. If there are any changes, you should note those with the reason on the attached Errata Sheet.

You should, please, date and sign the Errata Sheet and e-mail to the deposing attorney as well as to Veritext at Transcripts-fl@veritext.com and copies will be emailed to all ordering parties

It is suggested that the completed errata be returned 30 days from receipt of testimony, as considered reasonable under Federal rules*, however, there is no Florida statute to this regard.

If you fail to do so, the transcript may be used as if signed.

Yours,

Veritext Legal Solutions

* Federal Civil Procedure Rule 30(e)/Florida Civil Procedure Rule 1.310(e).

GRACE, INC., et al., vs. CITY OF MIAMI,
10-5-2023 DEPOSITION OF ALEXANDRA CONTRERAS
Job No. FLA6121394

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Under penalties of perjury, I declare that I have read
the foregoing document and that the facts stated in it
are true.

ALEXANDRA CONTRERAS

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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